

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division

BID FOR POSITION, LLC,

Plaintiff/Counterclaim Defendant,

v.

Civil Action No. 2:07cv582 (JBF-TEM)

AOL LLC,  
GOOGLE INC.,  
MICROSOFT CORP.,  
and MIVA, INC.,

**Jury Trial Demanded**

Defendants/Counterclaim Plaintiffs.

**DEFENDANT GOOGLE INC.'S MOTION FOR A PROTECTIVE ORDER BARRING  
TESTIMONY RELATED TO PLAINTIFF'S RULE 30(b)(6) DEPOSITION NOTICE  
AND DEPOSITION NOTICES BEYOND THE 10-DEPOSITION RULE**

Defendant Google Inc. ("Google"), by counsel, pursuant to Rule 26 of the Federal Rules of Civil Procedure and the Local Rules of Practice for this Court moves this Court for a protective order ("Motion for a Protective Order"). The grounds and authorities in support of Google's Motion for a Protective Order are set forth in Google's Memorandum in Support of Motion for a Protective Order Barring Testimony Related to Plaintiff's Rule 30(b)(6) Deposition Notice and Deposition Notices Beyond the 10-Deposition Rule.

Pursuant to Local Rule of Practice 37(E) of this Court, Google certifies that the parties have attempted unsuccessfully to resolve these discovery disputes in good faith.

Dated: July 3, 2008

Respectfully submitted,

/s/

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## **CERTIFICATE OF SERVICE**

I hereby certify that on July 3, 2008, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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